



Community
Alliance with
Family
Farmers

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5/2/97

Lester Snow and BDAC members
CalFed Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Mr. Snow and BDAC members,

As an advocate for sustainable management of natural resources, CAFF has been an active watchdog of the emerging water market in California since the 1980s. While we promote environmental restoration, our constituents live in regions where agriculture and water are the economic lifeblood, so we have worked to show that agricultural and environmental values can be harmonious.

With this balance in mind, we are alarmed at aggressive attempts to promote water sales without attention to adverse impacts on agricultural regions or the environment. We call your attention to one such attempt, the Supplemental Water Purchase Program, proposed by the Department of Water Resources. To-date, both the substance and the management of this program give water transfers a bad name, further polarizing the discussion in rural counties and positioning the few water sellers and buyers against the rest of the community.

The program proposes six years of transfers from northern counties of up to 400,000 acre feet of surface and groundwater supplies. Beneficiaries would be State Water Project contractors. The program is designed to address shortfalls in normal years (as opposed to drought years) and appears to have overlooked the principle of equitable benefits for environmental, agricultural and urban uses.

CAFF is submitting comments on the Draft EIR, and would be glad to provide copies to anyone who is interested. The EIR discounts potential adverse impacts based on the prediction that the full 400,000 acre feet would not be transferred in each of the six years of the program. Proposing a six year water transfer and then analyzing impacts based on an unsubstantiated statement that the transfer will not take place is hardly reassuring. The EIR further dismisses potential impacts by referring to the Drought Water Bank, which only transferred a comparable amount of water in one year, 1991. Finally, the

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combined impact of various ongoing and proposed transfer and conjunctive use programs is not treated seriously.

While we have a number of additional concerns about the inadequacies of the EIR which we have documented in our official comments to DWR, we believe that the program itself is seriously flawed. To discuss these concerns, a group including CAFF recently met with the DWR Program Manager for Water Acquisitions. The group included representatives of northern water districts, the environmental community, a former county supervisor and others. We asked that DWR meet with County Supervisors in targeted water-selling counties and made additional recommendations regarding improvements needed in the program. These requests have been denied, with DWR insisting upon a continuation of the CEQA process.

Many proposed CalFed actions may encourage water transfers. For this reason, BDAC has a responsibility to develop policy recommendations that will ensure that the water market is consistent with our guiding principles. If initiatives like the Supplemental Water Purchase Program are allowed to move forward without a collaborative or equitable spirit, the resulting polarization could easily jeopardize the CalFed process. In talking to an ever-widening network about the Supplemental Water Purchase Program, we find that very few people are aware of it. The comment period on the Draft EIR has been extended until May 30. I urge BDAC members to submit comments of their own.

Sincerely,



Judith Redmond
Director Emeritus